

## **EXHIBIT “B”**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

_____	:	Civil Action No. CV 97-3496 (WGB)
WALSH SECURITIES, INC.,	:	
	:	
Plaintiff,	:	Hon. William G. Bassler
	:	
vs.	:	
	:	
CRISTO PROPERTY MANAGEMENT,	:	
LTD., a/k/a G.J.L. LIMITED, et al.	:	
	:	
Defendants.	:	
_____	:	

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**PLAINTIFF'S FED. R. CIV. P. 26(a)(1) INITIAL DISCLOSURES**

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Robert A. Magnanini (RM 7356)  
BOIES, SCHILLER & FLEXNER LLP  
150 John F. Kennedy Parkway, Fourth Floor  
Short Hills, NJ 07078  
973-218-1111

Attorneys for Plaintiff  
Walsh Securities, Inc.

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Walsh Securities, Inc. makes its mandatory disclosures as follows:

A. Witnesses

1. The corporate representative of Cristo Property Management, Ltd., a/k/a G.J.L. Limited c/o Joseph v. Sorrentino, Esq. located at 404 Manor Road, Staten Island, NY 10314, (718) 720-4943, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

2. The corporate representative of DEK Homes of New Jersey, Inc. c/o Joseph v. Sorrentino, Esq. located at 404 Manor Road, Staten Island, NY 10314, (718) 720-4943, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

3. The corporate representative of Oakwood Properties, Inc. c/o Joseph v. Sorrentino, Esq. located at 404 Manor Road, Staten Island, NY 10314, (718) 720-4943, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

4. The corporate representative of National Home Funding, Inc. c/o Michael D. Schottland, Esq. of Schottland, Manning, Caliendo & Thomson located at 36 West Main Street, Freehold, NJ 07728, (732) 462-5626, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

5. The corporate representative of Capital Assets Property Management & Investment Co., Inc., current address and telephone number unknown, is likely to have

discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

6. The corporate representative of Capital Assets Property Management, L.L.C., current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

7. William J. Kane, c/o Joseph v. Sorrentino, Esq. located at 404 Manor Road, Staten Island, NY 10314, (718) 720-4943, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

8. Gary D. Grieser, currently incarcerated at Federal prison in Ft. Dix, N.J., is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

9. Robert Skowrenski, II, c/o Michael D. Schottland, Esq. of Schottland, Manning, Caliendo & Thomson located at 36 West Main Street, Freehold, NJ 07728, (732) 462-5626, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

10. Richard Calanni located at One Old Farm Road, Tinton Falls, NJ 07724, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

11. Richard DiBenedetto, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

12. James R. Brown, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

13. Thomas Brodo, located at 139B Fort Lee Road, Teaneck, NJ 07666-3241, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

14. Roland Pierson c/o Pasquale Menna, Esq. of Kauff and Menna located at 170 Broad Street, PO Box 762, Red Bank, NJ 07701, (732) 747-4300, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

15. Stanley Yacker, Esq., 33 Broadway, Apt. 1, Ocean Grove, NJ, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

16. Michael Alfieri, Esq., c/o Edward C. Bertucio, Esq. of Hobbie, Corrigan, Bertucio & Tashjy located at 125 Wyckoff Road, Eatontown, NJ 07724, (732) 380-1515, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

17. Richard Pepsny, Esq., c/o Mark W. Catanzaro, Esq. located at Blason IV, Suite 208, 513 S. Lenola Road, Moorestown, NJ 08057, (856) 235-4266, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

18. Anthony M. Cicalese, Esq., c/o Thomas D. Flinn, Esq. of Garrity, Graham, Favette & Flinn located at 1 Lackawanna Plaza, Box 4205, Montclair, NJ 07042, (973)

509-7500, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

19. Lawrence J. Cuzzi, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

20. Anthony D'Apolito, located at 909 Woodland Avenue, Wall Township, NJ 07719, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

21. The corporate representative of DAP Consulting, Inc. located at 909 Woodland Avenue, Wall Township, NJ 07719, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

22. The corporate representative of Commonwealth Land Title Insurance Co., c/o David Kott, Esq. of McCarter & English, LLP located at Four Gateway Center, 100 Mulberry St., Newark, NJ 07102-0652, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

23. The corporate representative of Nations Title Insurance of New York, Inc., c/o Anthony Argiropoulis, Esq. of Fox, O'Brien, Rothschild & Frankel located at 997 Lenox Drive, Lawrenceville, NJ 08648, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

24. The corporate representative of Fidelity National Title Insurance Co. of New York, c/o Anthony Argiropoulis, Esq. of Fox, O'Brien, Rothschild & Frankel located at 997 Lenox Drive, Lawrenceville, NJ 08648, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

25. The corporate representative of Coastal Title Agency, c/o Martin McGowan, Esq. of Methfessel & Werbel, P.C., 1308 Pierce Street, PO Box B, Rahway, NJ 07065, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

26. The corporate representative of Stewart Title Guaranty Company, c/o Frederick W. Alworth, Esq. of Gibons, Del Deo, Dolan, Griffinger & Vecchione located at One Riverfront Plaza Newark, NJ 07102, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

27. Irene DiFeo, located at 5 Leann Court, Old Bridge, NJ 08857, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

28. Donna Pepsny, located at 46 Bayside Drive, Atlantic Highlands, NJ 07716, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

29. The corporate representative of Weichert Realtors, c/o John McCusker, Esq., McCusker, Anselmi, Rosen, Carvelli & Walsh located at 127 Main Street, Chatham, New



Jersey 07928, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

30. The corporate representative of Vecchio Realty, Inc., d/b/a Murphy Realty Better Homes and Gardens, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

31. The corporate representative of Garden State Indemnity Co., c/o Andrew L. Indeck, Esq. of Scarinci & Hollenbeck, LLC located at 1100 Valleybrook Avenue, Lyndhurst, NJ 07071, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

32. William Acosta, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

33. Ronald C. Balogh, Jr., current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

34. Debra Campoli, current address and telephone unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

35. Stephen Christiano, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.



36. Brian G. Reilly, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

37. Christopher Crawford, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

38. Luis Dossantos, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

39. Barbara Freeden, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

40. Glenn R. Freeden, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

41. James B. Freeden, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

42. Peter A. Freeden, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

43. Peter Iannarella, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

44. Laure Hristov, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

45. Plamen Hristov, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

46. John Compoli, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

47. Debra Compoli, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

48. Fred Fusco, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

49. Dimitar Delyski, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

50. Christopher Crawford, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

51. Milosh M. Kitovitch, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

52. Arlene Lentino, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

53. Janice Vilardi, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

54. Kenneth J. Vellia, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

55. Joanna White, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

56. Bonnie Wright, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

57. Wesley Wright, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

58. Lawrence Cuzzi, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

59. Mario Cuzzi, Sr., current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

60. Patricia Cuzzi, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

61. Mario Cuzzi, Jr., current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

62. Anna Leodis, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

63. Laurie J. Kazmareck, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

64. Sean Kiley, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

65. David A. Liebler, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

66. Jill A. Montanye, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

67. James Papa, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

68. Don Devincenzo, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

69. Raymond C. Apgar, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

70. Rafael Bustos, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

71. Alicia Bustos, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

72. Yolanda Bustos-Lacy, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

73. Alicia Juergensen, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

74. Ralph Juergensen, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

75. Hans Juergensen, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

76. Ingrid Juergensen, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

77. Amanda Dippoloto, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.



78. Michael Dippoloto, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

79. Joseph Piscioneri, current address telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

80. Robert Walsh, c/o Robert A. Magnanini, Esq. of Boies, Schiller & Flexner LLP located at 150 John F. Kennedy Parkway, Short Hills, NJ 07078, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

81. James Walsh, c/o Walter F. Timpone, Esq., of McElroy, Deutsch, 1300 Mt. Kemble Avenue, Morristown, NJ 07962.

82. Elizabeth Ann DeMola, c/o Jeffrey Smith, DeCoitis, Fitzpatrick, Cole & Wisler, 500 Frank W. Burr Blvd., Teaneck, NJ, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

83. Ronnie Gonzalez, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

84. Fred Schlesinger, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

85. Peter Trebour, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

86. Don Lawson, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

87. Art Gilgar, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

88. Arthur Cohn, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

89. Leo McCabe, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

90. Peter Trebour, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

91. Kevin Marion, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

92. Paul Del Rosso, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

93. Carlyn Winston, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

94. Tony Parisi, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

95. Denise Clark, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

96. Ana Aceveda, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

97. Jon Anderson, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

98. John Oberdorff, Esq., St. John & Wayne, LLC, 2 Penn Plaza East, Newark, NJ 07105, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

99. John Blancett, Esq., Sedgwick, Detert, Moran & Arnold, 50 Maiden Lane, 41<sup>st</sup> floor, New York, NY 10038, counsel for Lloyds of London, is likely to have

discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

100. The corporate representative of Greenwich Capital Markets, Inc., current address and telephone number known, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

101. The corporate representative of Resource BancShares Mortgage Group, Inc., current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

102. The corporate representative of Resource BancShares Corporation, current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

103. The corporate representative of Prudential Securities, Inc., One New York Plaza, New York, NY 10292, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

104. The corporate representative of Montgomery Securities, Inc., current address and telephone number unknown, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment.

B. Documents

1. All documents produced by the parties to this matter to date are available for inspection in the repository at the offices of Boies, Schiller & Flexner LLP, Counsel for Plaintiff Walsh Securities, Inc. located at 150 John F. Kennedy Parkway, 4<sup>th</sup> Floor, Short Hills, New Jersey 07078.


C. Computation of Damages

1. Damages incurred by Plaintiff Walsh Securities, Inc. are compensatory and consequential damages in the amount of approximately \$25 million for the funding of fraudulently obtained mortgages, interest on the mortgage loans, \$400,000,000.00 or the value of Walsh Securities, Inc. plus damage to reputation, interest, lost profits, legal fees and costs.

D. Insurance Agreements

1. No insurance policy exists to satisfy part of all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. Walsh Securities did have a common bond in the amount of \$1,100,000.00 which was paid by Lloyds of London.

BOIES, SCHILLER & FLEXNER LLP  
Attorneys for Plaintiff  
Walsh Securities, Inc.



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Robert A. Magnanini (RM 7356)

Dated: April 11, 2005